United States Environmental Protection Agency
Region V
POLLUTION REPORT

Date: Monday, February 25, 2008
From: Tom Cook, OSC

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Subject: Peoples Gas Hough Place Station Site
2500 South Corbett Street, Chicago, IL
Latitude: 41.8469
Longitude: -87.6503

POLREP No.:	12	**Site #:**	B5HH
Reporting Period:	12/15/07 □ 1/11/08	**D.O. #:**	Not Applicable
Start Date:	6/18/2007	**Response Authority:**	CERCLA
Mob Date:	6/18/2007	**Response Type:**	Time-Critical
Completion Date:		**NPL Status:**	Non NPL
CERCLIS ID #:	ILN000510190	**Incident Category:**	Removal Action
RCRIS ID #:		**Contract #**	EP-S5-06-04

Site Description

The Hough Place Station Site (Site) is located at 2500 South Corbett Street, Chicago, Cook County, Illinois, in a mixed residential, commercial, and industrial area. The site is approximately 4.5 acres and is bordered to the north by the South Branch of the Chicago River, to the east by a paper storage and distribution facility, to the south by railroad property, and to the west by vacant property. The vacant property to the west and the Site are currently owned by Crowley□s Yacht Yard, which previously operated a sailboat storage, sales, and repair facility at the Site.

The Site is a former manufactured gas plant (MGP) that operated as an MGP facility from approximately 1886 to 1934. The Site was built in 1985 by the Equitable Gas Light and Fuel Company and in 1892 began producing □Pintsch gas,□ a relatively high quality gas produced by an oil gas process, for the Pintsch Compressing Company. Production of Pintsch gas occurred until about the early 1920s. In 1897 Peoples Gas acquired the facility and dismantled the station in 1934. Portions of the property were subsequently leased to other companies who used the property for storage of building materials and the production of asphalt, concrete, and other paving materials until approximately 1950. In 1953, Chicago Title and Trust Company took possession of the property as trustee. From approximately

1953 and 1978, the J.M. Corbett Company operated an asphalt mixing plant on the property. In 1978, Crowley□s Yacht Yard bought the property.

From 2000 to November 2006, several investigations were conducted by Peoples Gas at the Site. These investigations included the excavation of test pits, the installation of shallow monitoring wells, the collection of soil borings, the collection of soil and groundwater samples, a geotechnical investigation, and borings into river sediments. Test pits revealed staining and odors, and black asphalt tar at 2 feet below ground surface (bgs). Benzene, toluene, ethylbenzene, and xylene (BTEX); polynuclear aromatic hydrocarbons (PAH); metals, and cyanide were detected in several surface and subsurface soil samples. BTEX, PAHs, and metals were also detected in groundwater samples collected at the Site. Soil borings indicated tar at levels below the water level in the filled-in boat slip. The river investigation revealed sheens, odors, tar coated/stained material, and traces of tar in some of the sediment borings.

Remediation activities by Peoples Gas began in November 2006 under the Illinois Environmental Protection Agency (IEPA) Site Remediation Program. Peoples Gas is the potentially responsible party (PRP) for the site. People□s Gas contracted Burns & McDonnell Engineering Company, Inc. (BMcD) to remediate the Site, along with their subcontractors.

Remediation consists of excavation and disposal of contaminated soils. Excavation depths range from approximately 3 feet to 24 feet bgs. Other site activities conducted by the PRP include daily air monitoring, continuous 24-hour perimeter air monitoring and sampling, confirmation soil sampling, and water treatment, sampling, and discharge.

Prior to the U.S. EPA oversight at the Site, BMcD completed excavation of impacted material in excavation cells CF01 to CF58 (see BMcD map of excavation areas under □documents□ on the OSC website). An Administrative Order on Consent was signed by Peoples Gas in early June 2007 prompting the U.S. Environmental Protection Agency (U.S. EPA) to begin PRP oversight activities at the Site.

On June 12, 2007, a kick-off meeting was held at the 22nd Street Site between U.S. EPA, START, Peoples Gas, and BMcD, to discuss future oversight activities, documents required, and logistics for transmitting data and documents. The meeting addressed three MGP sites that U.S. EPA would be overseeing, all located within one mile of each other: 22nd Street Station, Hough Place, and Pitney Court. Note that one START member is to cover oversight of these three sites, splitting time between each of the three sites. Both Hough Place and Pitney Court remediations are expected to be completed by the middle of 2008, while the 22nd Street Station Site remediation is expected to be completed by March 2009.

On June 18, 2007, U.S. EPA began PRP oversight activities at the three Peoples Gas MGP sites: Hough Place Station, Pitney Court, and 22nd Street Station. The U.S. EPA Superfund Technical and Response Team (START) contractor is performing PRP oversight during the removal activities at the sites. As part of the removal activities, START collects or observes the collection of soil confirmation samples to confirm that the PRP cleanup objectives are

being met. Site contaminants of concern are:

- BTEX;
- PAHs;
- Synthetic precipitation leaching procedure (SPLP) lead, chromium, and selenium.

Cleanup objectives for the Hough Place Station Site are as follows:
1. Remove all source material.
2. For the 0 to 3.5 foot depth interval, remove all soil that exceeds IEPA TACO Tier 1 residential standards for soil ingestion and install a 3 foot engineered barrier.
3. For the 0 to 10 foot depth interval, remove all soil that exceeds IEPA TACO Tier 1 residential standards for soil inhalation and where necessary, install a 10 foot engineered barrier to prevent exposure via inhalation.
4. Invoke a construction worker notice and the City of Chicago Ordinance prohibiting installation of potable wells on the Site to eliminate the construction worker and groundwater exposure pathways.

In August 2007, Metropolitan Water Reclamation District of Greater Chicago (MWRD) finalized the discharge permit that authorizes treatment and discharge of treated Site water to an onsite MWRD sanitary sewer. START collects or observes the collection of treatment water samples to confirm that the MWRD objectives are being met. Samples are being collected to identify the potential presence of the following site contaminants of concern:

- Target Compound List (TCL) VOC;
- PAH; and
- Target Analyte List (TAL) Metals.

Treated water objectives for the Site are established by MWRD in the discharge permit issued for the site.

Current Activities

During the reporting period, the PRP excavated cells 095, 096 and 097. The PRP conducted confirmation sampling of excavation cells 093, 094, 095 and 096. The PRP subcontractor North Star, a sheet pile wall installation contractor, began installing cofferdams along the site south boundary. The PRP installed a temporary PVC buried pipeline to winterize the water treatment system.

On December 24-25 and 31, 2007 and January 1, 2008, the site was closed for a holiday.

A summary of the remediation activities performed during the reporting period are as follows:

- Transported 278 loads to CID Landfill in Calumet City, Illinois; trucks decontaminated prior to leaving site.
- Performed perimeter air sampling and air monitoring on a continuous basis (24-hour air samples and air monitoring is conducted around the perimeter). On December 19, 2007,

elevated benzene in air levels was detected: re-sample was below action levels. On December 17-18, 26, 2007, and January 2-3, 2008, elevated dust levels were detected: re-sample was below action levels. On January 7-8, 2008, elevated benzene in air levels were detected: benzene control measures were taken. On January 9, 2008, elevated dust levels, due to off-site street-sweeping, were detected: no dust control action was taken.

- Performed health and safety air monitoring during site activities.
- Performed street sweeping activities in front of the Site and along Senour Street.
- Performed daily de-watering activities in excavation areas. No water treatment or discharge was performed in December. Performed water treatment and discharged 198,420 gallons of treated water to the MWRD system in January.
- Collected confirmation soil samples from excavation cells 094, 095 and 096 floors; and cells 093, 094, 095 and 096 south walls.
- Backfilled completed excavation cells. The partially excavated central portion of Evans Slip, which has not yet been fully remediated, was backfilled for safety reasons. BMcD was unable to dewater Evans Slip quickly enough to reach the final excavation depth at this time. BMcD plans to re-excavate and confirmation sample in Spring 2008, when the soil is expected to be drier.

On December 27, 2007, START personnel collected one soil sample from the floor of excavation cell 094, along with BMcD. START personnel observed as BMcD collected one soil sample from the floor of cell 095. The samples were analyzed for BTEX and PAHs. The sample of cell 095 was also analyzed for SPLP metals. The soil sample results met the PRP cleanup levels as stated in the Remedial Action Plan (RAP). However, the BMcD cell 094 sample exceeded the class I soil component of groundwater ingestion objective for SPLP lead, and the START cell 094 sample exceeded the class II soil component of groundwater ingestion for SPLP lead. BMcD will perform RBCA 26 calculations for the lead detection, using the START sample result, to determine potential impact to the Chicago River north adjacent to the site.

On January 4, 2008, BMcD collected one soil sample from the floor of excavation cell 096. The samples were analyzed for BTEX and PAHs. The soil sample results met the PRP cleanup levels as stated in the RAP.

On January 11, 2008, START personnel collected one soil sample from the south wall of excavation cell 093, along with BMcD. START personnel observed as BMcD collected one soil sample each from the south walls of cell 094, 095 and 096 (soil horizon 4 □ 9 ft bgs). The samples were analyzed for BTEX and PAHs. The soil sample results met the PRP cleanup levels as stated in the Remedial Action Plan (RAP).

Planned Removal Actions

Planned removal actions at the Hough Place Station Site are as follows:

- Excavate soil per the RAP
- Transport excavated soil to CID Landfill for disposal
- De-water excavation areas
- Treat and dispose water onsite to the MWRD system, or dispose offsite to CID or Ortek

- Backfill completed excavation areas

Next Steps
The next steps to be carried out by the PRP are as follows:

- Complete excavation of cells 097; including disposal of soil
- Begin excavation of cell 098
- Continue to de-water excavation areas as required
- Treat water and discharge to MWRD system or dispose offsite
- Continue dust control activities
- Continue 24-hour perimeter air monitoring and sampling
- Continue air monitoring in work zones
- Continue street sweeping activities
- Continue to decontaminate trucks prior to trucks leaving site
- Collect confirmation samples of cell 097, when completed
- Backfill completed excavation cells with clean fill when confirmation results are received

Key Issues
None.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
RST/START	$80,000.00	$48,894.00	$31,106.00	38.88%
Intramural Costs				
Total Site Costs	$80,000.00	$48,894.00	$31,106.00	38.88%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

Disposition of Wastes

Waste Stream	Quantity	Manifest #	Disposal Facility
October 2007 Non-hazardous Soil □ Revision 1	7,395 yd3		CID RDF, Calumet City, IL
November 2007 Non-hazardous Soil	6,165 yd3		CID RDF, Calumet City, IL
November 2007 Non-hazardous Liquid Waste Water	79,000 gallons		CID RDF, Calumet City, IL
November 2007 Non-hazardous Liquid Waste Water	301,400 gallons		Ortek, Inc., McCook, IL

www.epaosc.net/HoughPlace